

REMARKS/ARGUMENTS

Applicant has reviewed and considered the Examiner's objections to claims 18 and 19 for insufficient antecedent basis. In response to Examiner's rejection of claims 18 and 19, Applicant has deleted "generated display" from claims 18 and 19 and amended claims 18 and 19 to read "a cover is placed in front of said LCD/organic display panel for protection of the LCD/organic display." The limitations of claims 18 and 19 now have sufficient antecedent basis.

Next, Applicant has reviewed and considered the rejection of claims 16 and 17 under U.S.C. § 103(a) for obviousness and in response to those rejections makes the following remarks and arguments.

The factual inquiries set forth in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966) that are applied for establishing a background for determining obviousness are summarized as follows: 1) determining the scope and contents of the prior art; 2) ascertaining the differences between the prior art and the claims at issue; 3) resolving the level of ordinary skill in the pertinent art; and 4) considering objective evidence present in the application indicating obviousness or nonobviousness.

Obviousness can be established by combining or modifying the teaching of the prior art to produce the claimed invention where there is some teaching, suggestion or motivation to do so. See MPEP 2143.01, citing *In re Kahn*, 441 F.3d 977, 986, 78 USPQ2d 1329, 1335 (Fed. Cir. 2006). Moreover, the mere fact that references can be combined or modified does not render the resultant combination obvious unless the results would have been predictable to one of ordinary skill in the art. See MPEP 2143.01 II, citing *KSR International Co. V. Teleflex Inc.*, 550 U.S. 398 (2007). In addition, rejections on obviousness cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. See MPEP 2143.01 IV, citing *KSR*, 398 (2007) quoting *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006).

Finally, if a proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. See MPEP2143.01 V citing *In re Gordon*, 733 F.2d 00, 221 USPQ 1125 (Fed. Cir. 1984).

Therefore, being mindful of the above case law, with respect to the rejection of claims 16 and 17 for being unpatentable over the Ochiai patent in view of the Onishi et al. patent, Applicant has amended claim 16 to highlight the distinctions between Applicant's invention and the Ochiai patent in view of the Onishi et al. patent. Specifically, Applicant has amended independent claim 16 to highlight the fact the first panel contains a plurality of high intensity light sources surrounded by a white background. The use of a white background is disclosed in the specification of the application, (see paragraph [0017]). Therefore, no new matter has been added to claim 16.

The use of a white background serves a dual purpose. First, the white background reflects the light emitted by the high intensity light sources or high intensity LEDs, thereby intensifying the light. Second, by intensifying the light emitted by the high intensity light sources or high intensity LEDs, the white background allows the high intensity light sources or high intensity LEDs to be operated with less energy while still emitting an intense light. Therefore, the white background conserves energy and prolongs the life of the high intensity light sources or high intensity LEDs.

The Ochiai patent and the Onishi et al. patent do not disclose a white background or any other reflective background used to reflect light created by a plurality of high intensity light sources or high intensity LEDs. Further, there is no teaching, suggestion or motivation to do so found in the prior art.


As the remaining claims are dependent upon independent claims 16 and 17, these claims should now be in position for allowance.

Finally, Applicant has added new claims 30-37, which further highlight the distinctions between Applicant's invention and the Ochiai patent in view of the Onishi et al. patent. Applicant believes that new claims 21-31 are novel and are not obvious in view of the Ochiai patent and the Onishi et al. patent for the reasons set forth above.

In view of the above amendments and remarks, Applicant believes the examiner will now find this patent application in a position for allowance and its expeditious passage to same is requested.

Should the examiner disagree or have any questions, comments or suggestions that will render this application allowable, a call to the undersigned attorneys of record is invited.

Respectfully submitted,
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